

Before the

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Global NAPs, Inc. Petition for Arbitration
Pursuant to Section 252(b) of the
Telecommunications Act of 1996 to
Establish an Interconnection Agreement
with Verizon New England, Inc. d/b/a
Verizon Massachusetts Inc. f/k/a New
England Telephone & Telegraph Co. d/b/a
Bell Atlantic - Massachusetts

D.T.E. 02-45

**GLOBAL RESPONSES TO
FIRST SET OF REQUESTS FOR ADMISSION, INTERROGATORIES,
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
OF VERIZON MASSACHUSETTS INC.**

Global NAPs, Inc. (“Global”) by counsel and pursuant to the schedule, submits the following responses and objections to the initial set of interrogatories and document requests “Requests” propounded by Verizon Massachusetts Inc. (“Verizon MA” or “Verizon”).

GENERAL OBJECTIONS APPLICABLE TO ALL REQUESTS

1. Global objects to these Requests to the extent that they purport to call for the production, identification or disclosure of information or documents protected by the attorney-client or other privileges, information or documents protected by the work-product doctrine, or information or documents protected as trial preparation material.

2. Global objects to these Requests to the extent that the definitions and instructions used by GNAPs in its Requests do not comply with the applicable Massachusetts Rules.

SPECIFIC OBJECTIONS

1. Global objects to these Requests to the extent they appear to call for the production of confidential, company proprietary, customer proprietary information or other competitively sensitive information. Global may consider production of confidential material if the parties can agree on an appropriate confidentiality stipulation or order.

2. Global objects to these Requests to the extent that they call for the production of documents beyond the requirements of the applicable Massachusetts Rules, or for documents not within the possession, custody or control of Global NAPs, Inc.

3. Global objects to these Requests to the extent that they call for Global to produce information or documents that are either publicly available or that are already in the possession, custody or control of Verizon.

4. Global objects to these Requests to the extent that they are overly broad and unduly burdensome.

5. Global objects to these Requests to the extent that they seek information not relevant to the dispute between the parties and not reasonably calculated to lead to the discovery of admissible evidence.

6. Global objects to these Requests to the extent that they seek to have Global create documents not in existence at the time of the Requests.

7. Global objects to these Requests to the extent they are not limited in geographical scope to Massachusetts.

8. Global objects to these Requests to the extent they request information regarding entities, namely affiliates that are neither a party to this proceeding nor regulated by this Commission.

9. Global objects to these Requests to the extent they are not limited in temporal scope.

III. INTERROGATORY REQUESTS

1. With regard to any issue in this arbitration where GNAPs alleges that Verizon's costs are "de minimis," please identify the sources upon which GNAPs relies for any such allegations.

Response:

See the Direct Testimony of Dr. Lee Selwyn and attachments thereto.

Respondent:

Dr. Lee Selwyn

2. To the extent that GNAPs alleges with regard to any issue in this arbitration that Verizon' s costs are "de minimis" based upon what other ILECs charge or do not charge, identify the sources upon which GNAPs relies for any such allegations.

Response:

See the Direct Testimony of Dr. Lee Selwyn and attachments thereto.

Respondent:

Dr. Lee Selwyn

3. Please provide maps or other documents showing the GNAPs local calling area, or areas if they vary, for which GNAPs offers or intends over the term of this interconnection agreement to offer its customers telecommunications services in Massachusetts, and specify where GNAPs' customers in Massachusetts are or are likely to be located.

Response:

Objection: 1, 2, 4, 5, 6, 7, 8. The size and design of Global NAPs' local calling areas will depend, to a great degree, on the ruling in this docket and has yet to be determined.

Respondent:

William Rooney

4. Please state whether GNAPs in Massachusetts intends to identify the entire LATA(s) as GNAPs' local calling area(s) for purposes of intercarrier compensation?

Response:

Objection: 1, 2, 4, 5, 6, 7, 8. The size and design of Global NAPs' local calling areas will depend, to a great degree, on the ruling in this docket and has yet to be determined. Global sincerely hopes that it is given the flexibility to design local calling areas for the purposes of intercarrier compensation based on the originating calling party's carrier-defined local calling areas, as is the case in Florida following the Commission's issuance of 000075-TP. Notwithstanding these objections, Global has publicly advocated LATA-wide local calling areas and currently abides with LATA-wide local calling areas for purposes of intercarrier compensation in other jurisdictions, e.g., New York.

Respondent:

William Rooney

5. If GNAPs' Response to Request No. 4 is in the affirmative, how many points of interconnection does GNAPs intend to place within GNAPs' local calling area(s) in Massachusetts?

Response:

Objection: 1, 2, 4, 5, 6 and 7. Notwithstanding these objections, Global is entitled to designate a single point of interconnection in each LATA where it exchanges traffic pursuant to Sec. 251(c)(2) as stated in its Arbitration Petition. Global may designate other points of interconnection with Verizon should Global secure sufficient customer mass to warrant additional facilities on an economic basis.

Respondent:

William Rooney

6. Please identify and list all NXX codes that GNAPs has obtained for use in Massachusetts and the associated rate centers that GNAPs has assigned to them.

Response:

M	S. Deerfield	413-208	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Becket	413-215	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Palmer	413-228	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Stockbridge	413-235	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Turner Falls	413-254	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Northampton	413-280	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Springfield	413-294	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Sandis Field	413-305	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Russell	413-312	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Pittsfield	413-321	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Lenox	413-332	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Otis	413-334	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Charlemont	413-352	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Bernard	413-361	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A	Station				h01228	D	
M	Lee	413-383	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Dalton	413-403	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Lenox	413-410	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Holyoke	413-425	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Ludlow	413-431	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Longmeadow	413-451	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Belcherton	413-460	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	North Adams	413-473	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Westfield	413-480	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	

M	Warren	413-487	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Williamsburg	413-502	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Wilbraham	413-513	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Brimfield	413-521	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Great	413-541	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A	Barrington				h01228	D	
M	Chester	413-556	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Chesterfield	413-581	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	East	413-604	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A	Hampton				h01228	D	
M	Conway	413-618	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Granville	413-622	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Housatonic	413-638	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Gilbertville	413-643	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	E.	413-647	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A	Longmeadow				h01228	D	
M	Huntington	413-653	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Hindsdale	413-669	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Hatfield	413-674	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Colrain	413-677	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Chicopee	413-683	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Ashfield	413-691	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Pittsfield	413-692	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Millersfield	413-702	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Monson	413-714	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Monroe Bdg	413-723	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Cummington	413-740	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Montague	413-751	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	W.	413-764	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A	Stockbridge				h01228	D	
M	Blandford	413-771	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Ware	413-778	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	

M	Worthington	413-793	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Williamson	413-803	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Sheffield	413-812	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Amherst	413-825	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Sheelburn	413-826	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A	Falls				h01228	D	
M	Greenfield	413-828	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Southwick	413-832	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Northfield	413-845	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	
M	Adams	413-895	126	SPFDMAWO01T	v04434,	SPFDMAMAOM	7755
A					h01228	D	

Respondent:

Robert Fox

7. Please identify the number (how many) of GNAPs end user customers who have been assigned NXX codes and who are not physically located in the geographical area to which that NXX code is assigned in Massachusetts.

Response:

Objection: 1, 2, 3, 4 & 5.

8. Please list the locations of all of GNAPs' Interconnection Points with all local exchange carriers in Massachusetts and provide all documents reflecting those Interconnection Points. For purposes of responding to this Request, an "Interconnection Point" is the point at which a Party who receives Reciprocal Compensation Traffic (as defined by Verizon in Exhibit B to Verizon's Response to GNAPs' Petition) from the other Party assesses Reciprocal Compensation charges (as defined by Verizon in Exhibit A to Verizon's Answer to GNAPs' Petition) for the further transport and termination of that Reciprocal Compensation Traffic.

Response:

Global has interconnection points with Verizon at 10 Merrymount Road in Quincy, MA for LATA 128 and at 1 Federal Street in Springfield for LATA 126. Global indirectly interconnects with all other MA carriers through Verizon facilities.

Respondent:

Robert Fox

9. Please identify all of the geographic locations in Massachusetts at which GNAPs proposes to physically interconnect its network with Verizon's network in order to provide telecommunications service(s) during the term of the interconnection agreement at issue in this proceeding.

Response:

Objection: 1, 2, 4, 5, 6 and 7. Notwithstanding these objections, Global is entitled to designate a single point of interconnection in each LATA where it exchanges traffic pursuant to Sec. 251(c)(2) as stated in its Arbitration Petition. Global may designate other points of interconnection with Verizon should Global secure sufficient customer mass to warrant additional facilities on an economic basis.

Respondent:

William Rooney

10. Please identify the average distance from the geographic point(s) at which GNAPs' network is physically interconnected with Verizon's network to the geographic location of the respective GNAPs' customers who receive traffic from Verizon's customers via the point(s) of interconnection.

Response:

Specific Objections: 1, 2, 4, 5, 6.

11. If Verizon is required to purchase transport from GNAPs, identify the sources of any of the charges that GNAPs will assess Verizon for this transport (including cost studies, etc).

Response:

Specific Objections 4, 5, 6 & 7. A response to this question would be speculative.

12. Please identify whether and which of GNAPs' customers collocate or otherwise maintain facilities at the same geographic location(s) as any of GNAPs' facilities in Massachusetts.

Response:

Specific Objections: 1, 2, 3, 4, 5, 6 & 8.

13. Please describe (including but not limited to quantity and/or length) the type and location of any telecommunications equipment that GNAPs has deployed in Massachusetts, including but not limited to the number and location of dedicated transport transmission paths from various Verizon transport hubs to GNAPs.

Response:

Specific Objections: 1, 2, 3, 4, 5, 6 & 8.

14. Please describe (including but not limited to quantity and/or length) the type and location of any telecommunications equipment that GNAPs leases in Massachusetts, including but not limited to the number and location of dedicated transport transmission paths from various Verizon transport hubs to GNAPs. If GNAPs leases any such equipment, include in your response an identification of the lessor.

Response:

Specific Objections: 1, 2, 3, 4, 5, 6 & 8.

15. Please identify any distance sensitive rates or charges that GNAPs assesses other telecommunications carriers or other customers in Massachusetts for transporting and/or terminating traffic to GNAPs' customers.

Response:

Specific Objections: 1, 3 & 8. Global's charges are provided for in tariffs and through individual contracts. These contracts are proprietary and subject to non-disclosure agreements.

16. With reference to Request 15, identify the sources of such rate or charge, including but not limited to a GNAPs tariff, price lists or contracts, and produce all intrastate and interstate tariffs, price lists, and contracts in which GNAPs offers a service at distance-sensitive rates.

Response:

See Objection to No. 14.

17. Please identify the specific telecommunications services that GNAPs offers its customers in Massachusetts and identify which services are offered pursuant to tariff and which are offered pursuant to a contractual arrangement.

Response:

Please see the attached tariff. Global is receptive to its customers' desires and will provide any and all services requested when it can do so on an economic basis by individual contract basis where such service is not available for purchase in the tariff.

Respondent:

Robert Fox

18. Please identify GNAPs' current customers in Massachusetts (including, but not limited to, the number and type of customer such as residential, business, Internet service provider, etc.).

Response:

Specific Objections: 1, 2, 3, 4, 5, 6 & 8.

19. For the past two years, and as a percent of all traffic either originated or terminated by GNAPs in Massachusetts, provide the percent of traffic GNAPs originated versus the percent of traffic terminated by GNAPs in Massachusetts.

Response:

Bob Fox is working on.

Respondent:

The ratio of traffic inbound to Global vs. outbound from Global exceeds ninety percent (90%) for the period in question. Verizon has its own measurements of this traffic and Global and Verizon have not agreed with each others' measurements. Global has repeatedly offered to provide Verizon with Call Data Records to resolve these differing measurements, but as yet, these have not been requested by Verizon.

20. For the past two years, and as a percent of all GNAPs' revenues in Massachusetts, provide the percent of revenues GNAPs generated from reciprocal compensation payments from other telecommunications carriers in Massachusetts, regardless of whether GNAPs has actually collected such revenues.

Response:

Global operates on a bill-and-keep basis for reciprocal compensation purposes with carriers other than Verizon because the exchange of traffic is insubstantial compared to the relevant legal and transactional costs.

Respondent:

William Rooney

21. Unless already specifically requested and provided in response to the above discovery requests, produce all documents referred to or relied upon in answering the above discovery requests and any documents GNAPs' witnesses intend to present as exhibits at the hearing.

Response:

Global will provide these as they become available and/or are produced to the extent they do not compromise confidentiality or are not otherwise objectionable.

Respondent:

William Rooney

CERTIFICATE OF SERVICE

I hereby certify that I have served by e-mail and or first class postage to all Verizon representatives listed on the service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of September, 2002.
